

FoE Europe Key points on the Zero Draft of the global framework for biodiversity after 2020 (CBD/WG2020/2/3)

Expectations

- The **level of ambition should not fall short of the Strategic Plan 2010-2020** and must be increased in the draft - The loss of biodiversity was to be halted by the Aichi targets by 2020 and a positive trend should have been initiated as well as a more sustainable use. The targets must reflect the full scope of the previous strategic plan and continuity in implementation needs to be ensured.
- **Binding mechanisms for implementation, accountability and monitoring** must be developed. The current wording is not binding enough. The National Biodiversity Strategies and Action Plans are still the basic means of implementing the global framework, but they should be internationally comparable, meaningful through appropriate indicators and transparent reporting, and verifiable with regard to national implementation.
- Parties should commit themselves to adhering to certain **principles** in the implementation of the GBF (protection of human rights, integration of IPLCs, precautionary principle, gender and generational justice etc.).
- The GBF must have highest priority at national level and be implemented across sectors by the entire government in accordance with its responsibilities and coordinated by the heads of government (**whole-of-government approach**).
- Only by **clearly addressing the drivers** (direct and indirect) can the loss of biological diversity be halted and sustainable change initiated. This includes in particular the immediate reduction of subsidies and incentives that are harmful to biodiversity.
- The 20 implementation targets for 2030 should be **mutually supportive and not contradictory**
- Adequate **financing** of the measures necessary to achieve the biodiversity goals must be ensured - at global and national level. At the same time, the use of biodiversity must be made sustainable and incentives that are harmful to biodiversity must be eliminated or converted into positive incentives, which would significantly reduce the need for funding (cf. OECD 2019).

Assessment of the Zero Draft

Affirmative:

- The **whole of government approach** is mentioned in two places. It should definitely be preserved and further emphasized. In particular, the draft decision, para 6 b), is important, as it calls on the parties to update their NBSAPs in line with the new Global Biodiversity Framework and to adopt their national obligations therein as whole-of-government policy instruments. However, the closely related issue of mainstreaming is hardly mentioned.
- Much of the content of the **Aichi targets** is reflected in the new GBF. However, important parts of Aichi Goals 4 (production and consumption), 6, 7 (forestry, fisheries) and 11 (protected area criteria, management, etc.) are missing, as is a clear address of the sectors.

Negative:

- The main reasons for the failure of the previous objectives were the **lack of implementation** and the lack of comparability, transparency, a binding review process, compliance and sanctions. **It is imperative that the proposals listed in Chapter G of the zero draft be further elaborated and concretised.** In addition to the whole governance approach and broad public participation in implementation, the sectors must be integrated into the GBF by assigning them clear goals and actions, and implementation should be supported by regulations and laws and that are regularly reviewed. (See e.g. IPBES recommendation for better implementation of existing policies).

The success of the post-2020 GBF depends largely on the strengthening of the implementation mechanisms.

- The need to initiate **transformative change** (see IPBES Global Assessment) is clearly recognised in the introduction, but not sufficiently reflected in the long-term goals for 2050 or in the implementation goals for 2030.
- The timeline set by the long-term goals for 2050 implies that the 2030 goals are a less ambitious intermediate step on the way to achieving them. This leads to a **weakening of some 2030 targets compared to the Aichi targets** and distracts attention from the high urgency of the transformative change that is scientifically required (see IPBES Global Assessment). AT 12, for example, only aims at eliminating the **most** harmful subsidies by 2030, while Aichi target 3 sets the elimination of **all** harmful incentives by 2020. These weaknesses must be removed and the focus placed on 2030 targets to ensure the right level of ambition and to meet the high urgency for action.
- It is unclear why long-term goal d) only mentions 4 of the 18 **nature's contributions of to people** mentioned in the IPBES Global Assessment. We propose to simply state in general terms that these contributions of nature for humans are maintained and guaranteed, especially since some of the contributions of nature for humans are mentioned among the action targets.
- The issue of "**sustainable use**" mutates, especially in the long-term goal d and in section b of the Action Targets ("**meeting people's needs**"), essentially into the goal of satisfying people's needs. Goals 6-11 call for quantitative values to increase the contribution of biodiversity to climate change mitigation (AT6), food security (AT7,8) or agricultural production (AT8) by X%. These demands are not in line with the CBD's objectives of conserving biodiversity and ensuring its sustainable and fair use. The CBD should certainly address interactions with other sectors. However, the CBD's task is to represent biodiversity concerns, also in line with the 2050 vision. Even an increase in production, e.g. through "sustainable intensification", can have a negative impact on biodiversity in many regions of the world and cause contradictions between the goals. These quantitative values must be deleted here. It would be better, also in the sense of the Global Sustainability Targets, to increase the share of biodiversity-compatible production in the sectors (ideally to 100%).
- The **direct drivers** are not addressed concretely enough. For the driver "land and sea use change", the wording is very vague, and there are no concrete targets or indicators for achieving the goals. For example, it does not address how agrobiodiversity or biodiversity can be preserved in the systems used. Other relevant areas such as infrastructure or mining are also not mentioned. Pesticides are not mentioned in AT 4, which addresses pollution. AT 6 is in favour of climate protection and adaptation to climate change, and a concrete goal is also formulated, but the concept of Nature Based Solutions does not seem to be defined quite appropriately. It should be taken into account that Nature Based Solutions must have the potential to contribute equally to biodiversity and climate goals (synergy effects) and should not only be "not harmful to biodiversity".

- **Indirect drivers** are by far not sufficiently addressed. AT 14 does advocate reform of the economic system and more sustainable supply chains in general. However, it only proposes to identify the number of private sector actors that take biodiversity into account in their strategies and lacks meaningful indicators for reducing the ecological footprint. We propose to take the text of Aichi Objective 4 as a basis for a target on production/consumption and to insert another one on trade/economy. In the case of consumption (Action target 17), in contrast to Aichi objective 4, only the role of consumers is addressed, but not that of governments and the economy.

- The basic principle that nature conservation and use of nature takes place in compliance with **human rights** and the guarantee of access/use **rights of indigenous and local communities (IPLCs)** is recognised, but is not sufficiently reflected in the goals and indicators (see some implementation goal 2 on protected areas, the central role of IPLCs as highlighted by IPBES is not reflected).

- The planned expansion of **protected areas** from 17 to 30% is to be assessed positively, but in contrast to Aichi Objective 11, many important parameters regarding their quality are missing (participation, representativeness, networking, integration into the surrounding landscape, effective and appropriate management, e.g. by IPLCs). These elements have to be put back into the text (and much better implemented and measured than Aichi Goal 11 has done so far)! In addition, the different figures lead to confusion. Only the total number (30%) should appear in the text, even though this must of course include all valuable areas.

- The text contains several passages with phrases like no "**net**" loss, "**net**" increase or "**on average**", which imply that **destruction is allowed as long as another area is maintained or restored**. Many ecosystems take decades or even centuries to be restored once they are destroyed, and species extinction cannot be compensated for. It is therefore essential that the conservation of existing natural assets takes precedence over restoration and that this is made clear in the text. (e.g. in Long-term goal a,b and c and in Action target 1).

- ● The effective and credible continued existence of the **Nagoya Protocol** is seriously threatened by the possibility of passing on genetic information by electronic means. Goal E and AT 11 must therefore also refer to **digital sequence information (DSI)**. If no agreement is reached here, agreement on the entire post-2020 framework may be jeopardised.

- The implementation of the above-mentioned goals and the elimination of **subsidies and incentives harmful to biodiversity** would significantly reduce the pressure on biodiversity and the need for **financial resources**. AT 12 only advocates the elimination of those subsidies that are "most harmful" to biodiversity, but **all** harmful subsidies and incentives should be eliminated or reformed. AT 14 refers to the reform of economic sectors. With regard to the above-mentioned incentives, the link with the financial sector should also be named explicitly. Measures should be included to reduce investments in biodiversity-damaging practices and to redirect these capital flows towards sustainable models of development, production and consumption. AT 15 also stipulates that biodiversity financing should meet needs. We propose that it should also be mandatory at national level and that a percentage of national budgets should be included in AT 15 instead of an increase of x%, which would place a particular obligation on those who already contribute a great deal (and would open a debate on the appropriate baseline).

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The comments refer to:

CBD/WG2020/2/3 - Zero draft of the post-2020 global biodiversity framework

CBD/WG2020/2/3/ADD1 - Preliminary draft monitoring framework for the goals and preliminary draft monitoring framework for targets